

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

RALPH CALDWELL,)
)
Plaintiff,)
)
v.) Cause No.
)
)
ST. LOUIS COUNTY GOVERNMENT,)
)
)
CO. CONARD, in his individual)
and official capacity,)
)
LT. ANDERSON, in his individual)
and official capacity,)
)
Defendants.)

NOTICE OF REMOVAL

Defendant St. Louis County respectfully submits this Notice of Removal of Action (the "Notice") to the United States District Court for the Eastern District of Missouri, Eastern Division, pursuant to 28 U.S.C. §1441, et seq. In support of this Notice, Defendant states:

1. Plaintiff Ralph Caldwell initiated a civil action by filing a Petition in the Circuit Court of St. Louis County, Missouri, Cause No. 17SL-CC01902 (the "State Court").
Pursuant to 28 U.S.C. §1446(a) and Eastern District Rule 81-2.03, a complete copy of the State Court file in this action is attached hereto and filed herewith as Exhibit A.
2. No further proceedings have taken place in the State Court as of the date of filing of the Notice of Removal.
3. Defendant St. Louis County was served with the Petition and summons on June 27, 2017. Defendants CO. Conard and Lt. Anderson have not been served.

4. The Petition contains allegations that Defendant committed Constitutional torts pursuant to 42 U.S.C. §1983, et seq.
5. Pursuant to 28 U.S.C. Section 1446(b), Defendant St. Louis County timely filed this Notice.
6. This Court has jurisdiction under 28 U.S.C. §1331, and this action is subject to removal under 28 U.S.C. §1441.
7. The Original Filing Form is attached to this Notice of Removal as Exhibit B.
8. The Civil Cover Sheet is also attached to this Notice of Removal as Exhibit C.

WHEREFORE, Defendant St. Louis County removes this action to the United States District Court for the Eastern District of Missouri pursuant to 28 U.S.C. §§1441 et seq.

PETER J. KRANE
COUNTY COUNSELOR

/s/ Priscilla F. Gunn
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CERTIFICATE OF SERVICE

A copy of this pleading was served on Gregory Fenlon by placing a copy in the United States mail this 21st day of July, 2017.

Gregory Fenlon,
231 S. Bemiston, Ste. 910,
Clayton, Missouri 63105

/s/ Priscilla F. Gunn